

# EXHIBIT A

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19     Attorneys for Defendants, CITY OF  
20     ANAHEIM, JORGE CISNEROS; PAUL  
21     DELGADO; BRETT HITMAN; KENNETH  
22     WEBER; and CAITLIN PANOV

23     JOHANNA LOPEZ, et al.,

24     Plaintiffs,

25     v.

26     CITY OF ANAHEIM; CITY OF  
27     SANTA ANA; DAVID VALENTIN;  
28     JORGE CISNEROS; PAUL  
29     DELGADO; BRETT HEITMAN;  
30     KENNETH WEBER; CAITLIN  
31     PANOV; Does 1-10, ,

32     Defendants.

33     Case No.: 8:22-cv-01351-JVS-ADS

34     **DEFENDANT CITY OF  
35     ANAHEIM'S INITIAL  
36     DISCLOSURES**

37     Scheduling Conf.  
38     Date: October 17, 2022  
39     Time: 10:30 a.m.  
40     Ctrm: 10C

41     Action Filed: July 21, 2022  
42     Trial Date: None set

43     Pursuant to FRCP 26(a)(1), Defendants, CITY OF ANAHEIM, JORGE  
44     CISNEROS; PAUL DELGADO; BRETT HITMAN; KENNETH WEBER; and  
45     CAITLIN PANOV, makes the following initial disclosures:

1       1. Witnesses. Defendants' witnesses are:

2       All Witnesses identified in APD Police Reports GO# 2021-142831 (OIS  
3 open investigation), GO#21-142757 (stolen vehicle report), Santa Ana Police  
4 Report #21-020830, OCDA OIS Investigation #21-004162 (not complete), DOJ  
5 #BI-RI2021-00030 (OIS not complete), Crime Lab FR #21-52738 and Coroner's  
6 Report #21-05765-MT, including, but not limited to:

7       1) Paul Delgado, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
8 765-1900

9       2) Kenneth Weber, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
10 765-1900

11       3) Catalin Panov, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
12 765-1900

13       4) Brett Heitmann, former APD Police Officer, 425 S. Harbor Blvd.,  
14 Anaheim, CA 92005, (714) 765-1900

15       5) Jorge Cisneros, APD Chief of Police, 425. S. Harbor Blvd., Anaheim,  
16 CA 92805 (714) 765-1900

17       6) Garret Melberg, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
18 765-1900

19       7) Phillip Vargas, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
20 765-1900

21       8) Ricky Reynoso, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
22 765-1900

23       9) Brandon Mullins, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,  
24 (714) 765-1900

25       10) Ernesto Sena, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
26 765-1900

27       11) Frank Ramirez, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,  
28 (714) 765-1900

1           12) James Lopez, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
2       765-1900  
3           13) Steve Salicos, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
4       765-1900  
5           14) Michael Williams, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,  
6       (714) 765-1900  
7           15) Curt Ledesma, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
8       765-1900  
9           16) Brent Sporn, 370 S. Wilde St., Anaheim, CA 92802 (714) 240-3473  
10          17) OCFA Captain/Paramedic Christopher Jaime, 120 W. Walnut St.,  
11       Santa Ana, CA 92701 (714) 567-3255  
12          18) Kenny Aguilar, SAPD Officer, 60 Civic Center Plaza, Santa Ana, CA  
13       92701 (714) 245-8665  
14          19) Nelson Menendez, SAPD Officer, 60 Civic Center Plaza, Santa Ana,  
15       CA 92701 (714) 245-8665  
16          20) Luis Galeana, SAPD Corporal, 60 Civic Center Plaza, Santa Ana, CA  
17       92701 (714) 245-8049  
18          21) Manuel Pardo, SAPD Officer, 60 Civic Center Plaza, Santa Ana, CA  
19       92701 (714) 245-8049  
20          22) Sergio Martinez, SAPD Officer, 60 Civic Center Plaza, Santa Ana, CA  
21       92701 (714) 245-8049  
22          23) Randy Lucio, 1245 W. Santa Ana Blvd., Santa Ana, CA 92703, (714)  
23       542-8428  
24          24) Dr. Yong-son Kim, OC Coroner's Office, 1071 W. Santa Ana Blvd.,  
25       Santa Ana, CA 92703  
26          25) Vanessa Havro, OC Crime Lab, 320 N. Flower St., Santa Ana, CA  
27       92703 (714) 834-4510  
28          26) Sharon Mae Marissa Cortez, 678 S. Breezy Way, Orange, CA 92869

1 (714) 473-2635  
2 27) Alex Hernandez Cortez, 678 S. Breezy Way, Orange, CA 92869 (714)  
3 814-5358  
4 28) Jeff Mundy, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
5 765-1900  
6 29) Jimmy Elliott, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
7 765-1900  
8 30) Michael Dohmann, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,  
9 (714) 765-1900  
10 31) Anthony McGlade, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,  
11 (714) 765-1900  
12 32) Nathaniel Cox, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
13 765-1900  
14 33) John Duran, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
15 765-1900  
16 34) Mark Gell, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
17 765-1900  
18 35) Jared Dewald, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
19 765-1900  
20 36) Shane Spielman, APD, 425 S. Harbor Blvd., Anaheim, CA 92005,  
21 (714) 765-1900  
22 37) Sonia Ceniceros, 317 E. La Palma Ave. Anaheim, CA 92801 (714)  
23 737-9232  
24 38) Rossi Elena Ceniceros, 814 S. Dakota St. Anaheim, CA 92805 (714)  
25 678-8952  
26 39) Joseph Gross, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
27 765-1900  
28 40) Antonio Lopez, Plaintiff

1                   41) Johnanna Lopez, Plaintiff  
2                   42) April Rodriguez, Plaintiff  
3                   43) Rachel Perez, Plaintiff  
4                   44) Rocio Flores, Plaintiff  
5                   45) Minor Plaintiffs M.R., B.L., J.L., and S.L.  
6                   46) David Valentin, SAPD Chief of Police, 60 Civic Center Plaza, Santa  
7                   Ana, CA 92701  
8                   47) Ryan Hunter, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
9                   765-1900  
10                  48) Brian Leist, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
11                  765-1900  
12                  49) Jeff Hemerson, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
13                  765-1900  
14                  50) Eric Trapp, APD, 425 S. Harbor Blvd., Anaheim, CA 92005, (714)  
15                  765-1900  
16                  51) Abelardo Oropeza, SAPD Sgt., 60 Civic Center Plaza, Santa Ana, CA  
17                  92701  
18                  52) Johnathan Hernandez, SA City Councilmember, 22 Civic Center  
19                  Plaza, Santa Ana, CA 92701 (714) 647-6900  
20                  53) All Witnesses disclosed by the Plaintiffs and Co-Defendants.  
21                  2. Documents. Defendants provide the following description of their  
22                  documents required by FRCP 26(a)(1)(B):  
23                  The complete APD Police Report GO# 2021-142831 (OIS open  
24                  investigation), GO#21-142757 (stolen vehicle report) and DOJ #BI-R!2021-  
25                  00030 (OIS investigation not complete)/OCDA Investigation #21-004162 (OIS  
26                  investigation not complete), will be produced to Plaintiffs' counsel once  
27                  completed and a Protective Order is entered by the Court, including, but not  
28                  limited to the following documents:

- 1) OCDA #21-004162 (OIS Investigation, not complete)
- 2) DOJ #BI-RI2021-00030 (OIS Investigation/Report, not complete)
- 3) SAPD #21-020830
- 4) Interview of APD Inv. Garrett Melberg
- 5) Interview of APD Inv. Phil Vargas
- 6) Interview of APD Inv. Ricky Reynoso
- 7) Interview of OCFA Captain/Paramedic Christopher Jaime
- 8) Interview of APD Officer Brandon Mullins
- 9) Interview of APD Officer Ernesto Sena
- 10) Interview of SAPD Officer Kenny Aguilar
- 11) Interview of SAPD Officer Nelson Menendez
- 12) Interview of APD Officer Frank Ramirez
- 13) Interview of APD Officer James Lopez
- 14) Interview of APD Officer Steve Salicos
- 15) Interview of APD Officer Mike Williams
- 16) Interview of SAPD Corporal Luis Galeana
- 17) Interview of APD Sgt. Curt Ledesma
- 18) Interview of SAPD Officer Manuel Pardo
- 19) Interview of SAPD Officer Sergio Martinez
- 20) Interview of witness Brentt Sporn
- 21) Interview of witness Randy Lucio
- 22) Black Guess bag and plastic water bottle-OC Crime Lab
- 23) Handwritten Suicide Note/photo-OC Crime Lab
- 24) Drug Paraphernalia-OC Crime Lab
- 25) Autopsy Report by Coroner Yong-son Kim Case #21-05765-TM
- 26) OC Crime Lab Reports FR#21-52851, including, but not limited to,  
Tox Exam Report by Forensic Scientist Vanessa Havro
- 27) Autopsy Photos (194) OC Crime Lab

- 1 28) Post Embalming Photos (54) OC Crime Lab
- 2 29) Officer Processing Photos (108) OC Crime Lab
- 3 30) Scene Photos (117) OC Crime Lab
- 4 31) Scene Photos (289) OC Crime Lab
- 5 32) Vehicle Processing Photos (47) OC Crime Lab
- 6 33) Aerial Photos/Videos by SAPD
- 7 34) GO#21-142831 (OIS open investigation)
- 8 35) CAD 21-142831
- 9 36) GO#21-142757 (stolen vehicle report)
- 10 37) CAD 21-142757
- 11 38) APD BWC-Officers Paul J. Delgado, Catalin M. Panov, Kenneth A.  
12 Weber, and Sgt. Mundy, John Duran, James R. Elliott (Angel  
13 helicopter video), Vicent Nguyen, Ryan Hunter, James Lopez, Dale  
14 Miller, Anthony McGlade, Brandon Mullins, Ernesto J. Sena, Michael  
15 R. Dohmann, Michael Williams, Frank Ramirez, Nathaniel Cox, Randy  
16 N. Sany, Patrick Bradley, Phillip M. Vargas, Ricardo Reynoso,  
17 Lorenzo Uribe and Joseph Gross
- 18 39) Booking Photos of Brandon Lopez
- 19 40) Criminal history-Brandon Lopez, including, but not limited to,  
20 OCSC Cases 21NF0446, 20NM01327, 19WM05718 and 17NM08088  
21 and related Warrants.
- 22 41) Critical Incident Video #21-142831:  
23 <https://www.youtube.com/watch?v=iLmnmgjeHik&t=258s>
- 24 42) Interview of Officer Panov by Special Agents Estrada and Cryar
- 25 43) Interview of Officer Weber by Special Agents Estrada and Carlos
- 26 44) Interview of Officer Delgado by Special Agents Cryar and Carlos
- 27 45) Interview of Officer Heitmann by Special Agents Black and Estrada
- 28 46) APD Dispatch audio

1 47) APD Radio traffic  
2 48) 2-Orange-3 Radio traffic audio  
3 49) OC Crime Lab Reports FR #219-52738  
4 50) OnSceneTV video by Brent Sporn  
5 51) APD GO#2021-6797 (211 PC Robbery)  
6 52) Declaration in Support of Arrest Warrant (GO#21-6797)  
7 53) APD GO#2021-11552 (211 PC Robbery)  
8 54) APD GO#2021-13451 (211 PC Robbery)  
9 55) APD GO#2021-14211 (211 PC Robbery)  
10 56) APD GO#2020-17378 (Domestic Violence)  
11 57) SAPD Report 2021-20827  
12 58) SAPD Traffic Collision Report 2021-20871  
13 59) SAPD CAD  
14 60) SAPD BWC (numerous officers, including, but not limited to Sgt.  
15 Oropeza, Officers Sanudo, Hatziefstratiou, Arias).  
16 61) SAPD Drone Photos and Videos  
17 62) SAPD Scene Photos  
18 63) OCFA Report Incident #21-119028  
19 64) All Documents disclosed by the Plaintiffs and Co-Defendants.  
20 3. Damages. None, except costs and attorney's fees.  
21 4. Insurance. Defendant City of Anaheim is self-insured for \$1  
22 million.

23 Defendants maintain the right to supplement these disclosures to the extent  
24 new witnesses, documents and evidence may be obtained or discovered during  
25 the discovery process. Pursuant to the Court's entry of a protective order in this  
26 action and completion of the investigations, Defendants will amend their initial  
27 disclosures and send a copy of the completed DOJ/DA's investigations and APD  
28 reports/BWCs to Plaintiffs' counsel.

1 Dated: October 10, 2022

ROBERT FABELA, CITY ATTORNEY

2

3

Bv: /s/ Moses W. Johnson, IV

4

Moses W. Johnson, IV  
Assistant City Attorney  
Attorneys for Defendants  
CITY OF ANAHEIM, JORGE  
CISNEROS; PAUL DELGADO;  
BRETT HITMAN; KENNETH WEBER;  
and CAITLIN PANOV

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**PROOF OF SERVICE**

*Lopez v. City of Anaheim;*

USDC, Central Dist. Case No.: 8:22-cv-01351-JVS-ADS

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 200 S. Anaheim Boulevard, Suite 356, Anaheim, California 92805.

On October 10, 2022, I served the foregoing document described as:  
**DEFENDANT CITY OF ANAHEIM'S INITIAL DISCLOSURES**

on interested parties in this action by placing the original/a true copy thereof enclosed in sealed envelope(s) addressed as follows:

**SEE ATTACHED SERVICE LIST**

**BY MAIL:** As follows: I am readily familiar with the City's practice of collection and processing correspondence for mailing with the U.S. Postal Service. Under that practice correspondence is deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Anaheim, California in the ordinary course of business. The correspondence described above was placed for deposit at 200 S. Anaheim Boulevard, Anaheim, California 92805, on the date set forth above.

**BY ELECTRONIC MAIL TRANSMISSION:** By electronic mail submission by transmitting a PDF format copy of such document(s) to each such person at the email addresses listed. The document(s) was transmitted by electronic transmission and such transmission was reported as complete and without error.

**BY FACSIMILE:** I caused the contents of said envelope to be delivered by facsimile transmission to the above addressee(s).

**BY METHOD OF OVERNIGHT DELIVERY:** I caused such envelope(s) to be delivered via Express Mail or other method of delivery providing for overnight delivery to the addressee(s) designated.

I declare under penalty of perjury that the above is true and correct.

Executed at Anaheim, California.

/s/ Maria Segovia

Maria Segovia

**SERVICE LIST**

*Lopez v. City of Anaheim;*  
USDC, Central Dist. Case No.: 8:22-cv-01351-JVS-ADS

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